REMARKS

Claims 1-20 are currently pending in the application. Claims 1, 10, and 13 have been amended herein. No claims have been added or canceled. Accordingly, claims 1-20 will be pending following the entry of this paper. Reconsideration of the present application is respectfully requested in view of the foregoing amendments and following remarks.

Claims 1 and 3-14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,519,509 to Nierlich et al. (hereinafter referred to as "Nierlich") in view of U.S. Patent No. 6,266,713 to Karanam et al. (hereinafter referred to as "Karanam"). The rejection is respectfully traversed.

Claim 1

Independent claim 1 is directed to a reconfigurable network-equipment power-management system. Claim 1 comprises a combination of elements, including:

> a plurality of power-control outlets disposed in the power-distribution apparatus, the plurality of power-control outlets connectable in power supply communication with the power input and one or more separate electronic appliances;
>
> a plurality of power-control relays disposed in the power-distribution apparatus, each of the plurality of power-control relays in power control communication with at least one among the plurality of power-control outlets, whereby the plurality of power-control outlets and the plurality of power-control relays provide operating power to the one or more separate electronic appliances and are able to interrupt the operating power to the one or more separate electronic appliances;
>
> a power-control outlet user configuration file accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration file comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus

It is respectfully submitted that the cited references do not render claim 1 obvious. Nierlich discloses a system and method for monitoring and controlling energy distribution. Karanam is directed to a dynamic data exchange (DDE) server that allows external programs to access power management data. It is submitted that neither Nierlich nor Karanam provide any teaching of a *power-control outlet user configuration file* accessible by a remote user system for affecting *power provided or interrupted to the plurality of power-control outlets*, as claimed.

The Office Action, at pages 2-5, addresses the arguments provided in the prior Reply. Specifically, at page 3, the Office Action states that Nierlich discloses power-control outlets in communication with the power input of a power-distribution apparatus. The Office Action asserts that Nierlich discloses at col. 3, lines 40-52, voltage channels connected to a power-distribution apparatus' power supply. Applicants note that the voltage channels disclosed by Nierlich do not read on the claimed power-control outlets because Nierlich contains no disclosure of providing operating power to any separate appliances. This is contrary to Claim 1, which recites operating power is provided to separate electronic appliance(s) through the plurality of power-control outlets and the plurality of power-control relays. Furthermore, claim 1 recites the power-control outlets and power-control relays are able to interrupt the operating power to the one or more separate electronic appliances.

The Office Action, at page 4, goes on to describe that Nierlich allegedly discloses a configuration file that affects the power to the plurality of power-control outlets. As described, Nierlich contains no disclosure of the claimed power-control outlets, and thus cannot disclose a configuration file that affects power to power-control outlets. This is further supported throughout the specification, for example, Nierlich describes, at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems* (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can

interface end-user's controls 24 and allows relatively low power signals to control high powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or end-user control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed power-control outlets, because these channels do not provide operating power to one or more separate electronic appliances, and are not able to provide or interrupt such power.

The Office Action, at page 8, asserts that Nierlich does not disclose exporting a power-control user configuration file, and relies on Karanam as providing such a disclosure. However, Karanam does not cure the deficiencies of Nierlich as described above. Karanam is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. As such, Karanam is devoid of any teaching or suggestion relating to power-control outlets, or a power-control outlet configuration file as recited by claim 1.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 1 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious, and

applicants respectfully submit that the 35 U.S.C. $ 103(a) rejection should be withdrawn from independent claim 1 and such action is respectfully requested.

Each of claims 3-9 is a dependent claims that depends either directly or indirectly from independent claim 1. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect claim 1 from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claim 10

Independent claim 10 is directed to a method of managing user configuration data in a reconfigurable network-equipment power-management and distribution system. Claim 10 comprises a combination of elements, including:

> remotely controlling the plurality of power-control outlets disposed in the local power-distribution apparatus with a remote control application to supply or interrupt power to one or more of the plurality of power-control outlets;
>
> transferring a power-control outlet user configuration file to the local power-distribution apparatus, the power-control outlet user configuration file comprising user configuration data for supplying or interrupting power for each of the plurality of power-control outlets disposed in the local power-distribution apparatus

It is respectfully submitted that the cited references do not render claim 10 obvious. Nierlich, as discussed above, discloses a system and method for monitoring and controlling energy distribution, and is devoid of any teaching of transferring a power-control outlet user configuration file comprising user configuration data for *supplying or interrupting power for each of the plurality of power-control outlets*, as claimed. The Examiner asserts that Nierlich discloses voltage channels read on the claimed power-control outlets, and that Nierlich further discloses that the device receives instructions that control the voltage

channels. However, as described, this reference does not provide any teaching or suggestion of supplying or interrupting power to power-control outlets, and therefore cannot disclose transferring a user configuration file as claimed.

More specifically, Nierlich describes that a network access device may be used to monitor various power meters and provide control signals that may interface with other systems to reduce power consumption during a curtailment event. As discussed above, Nierlich contains no disclosure of the claimed power-control outlets, and thus cannot disclose transferring a configuration file as claimed. This is further supported throughout the specification, for example, Nierlich describes, at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems* (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can interface end-user's controls 24 and allows relatively low power signals to control high powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or end-user control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed power-control outlets, because these channels do not provide operating power to one or more separate electronic appliances, and are not able to provide or interrupt such power.

Also, similarly as discussed above, Karanam does not cure the deficiencies of Nierlich. Karanam is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may

provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. As such, Karanam does not provide any teaching or suggestion relating power-control outlets or transferring a power-control outlet configuration file, as recited by claim 10.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 10 obvious. Accordingly, claim 10 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. § 103(a) rejection should be withdrawn from independent claim 10 and such action is respectfully requested.

Each of claims 11 and 12 is a dependent claims that depends either directly or indirectly from independent claim 10. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect claim 10 from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claim 13

Independent claim 13 is directed to a remote power manager system in communication with a distal power manager application through a data communications network. Claim 13 comprises a combination of elements, including:

> a remote power manager having power input connectable to a power network that provides power to be distributed to associated electronic devices, a plurality of power-control power output ports connectable to the power input and the associated electronic devices, a power controller in power controlling communication with the

> plurality of power-control power output ports, a data communications network port system in communication with the power controller and being connectable to the data communications network, and a power manager memory providing storage for a power-control power output port user configuration file, the power-control power output port user configuration file comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports

It is respectfully submitted that the cited references do not render claim 13 obvious. Nierlich, as discussed above, discloses a system and method for monitoring and controlling energy distribution, and is devoid of any teaching of a remote power manager having a plurality of power-control power output ports connectable to the power input and the associated electronic devices, and a power manager memory providing storage for a power-control power output port user configuration file, the power-control power output port user configuration file comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports, as claimed. The Examiner asserts that Nierlich discloses voltage channels read on the claimed power-control power output ports, and that Nierlich further discloses that the device receives instructions that control the voltage channels. However, similarly as described above, this reference does not provide any teaching or suggestion of supplying or interrupting power to power-control power output ports, and therefore cannot disclose a remote power manager as claimed.

More specifically, Nierlich describes that a network access device may be used to monitor various power meters and provide control signals that may interface with other systems to reduce power consumption during a curtailment event. For example, Nierlich describes at col. 7, lines 16-21, that analog and relay controlled voltage channels are preferably connected to the end-user's *control systems*. (emphasis added). This is further supported at col. 7, lines 34-47, where Nierlich describes that the voltage channels can generate signals "that can interface end-user's controls 24 and allows relatively low power signals to control high

powered devices." Furthermore, the analog voltage channels described in Nierlich can produce a voltage range from 0.95V and 2.6V, that may interface and control end-user control systems. The relay-controlled voltage channels can generate signals of varying pulse widths that vary between 20 and 90 ms intervals. Nierlich is consistent throughout the specification that the network access device may be used to interface with an end-user site to provide information that may be used by an individual or control systems to control the user's loads. Therefore, the voltage channels cannot read on the claimed remote power manager having a plurality of power-control power output ports.

Also, similarly as discussed above, Karanam does not cure the deficiencies of Nierlich. Karanam is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. The disclosed DDE server includes logical data tables, and a variety of connected modules, as described at col. 5, lines 1-39, and illustrated in Fig. 3. Karanam describes, for example, at col. 5 lines 32-36, that a load management module may provide for tracking power demand and automatically shedding non-critical loads to prevent peak demand penalties. In such a manner, the system of Karanam is similar to that described in Nierlich, as both systems may provide commands to other systems related to controlling other systems. As illustrated in Fig. 3, the output of the module is provided to a DDE server that is connected to an interface card that communicates with a network. Karanam does not provide any teaching or suggestion relating a remote power manager as recited by claim 13.

Therefore, it is submitted that Nierlich and Karanam, alone or in any reasonable combination, do not render claim 13 obvious. Accordingly, claim 13 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. $ 103(a) rejection should be withdrawn from independent claim 13 and such action is respectfully requested.

Claim 2 has been rejected under 35 U.S.C. §103(a) as being unpatentable over the Nierlich and Karanam, and further in view of U.S. Patent No. 6,459,175 to Potega (hereinafter referred to as "Potega").

Claim 2 is a dependent claim that depends from independent claim 1 . Consequently, this dependent claim is at least allowable for the reasons noted with respect to the independent claim from which it depends. This dependent claim may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claims 15-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Nierlich and Karanam, and further in view of U.S. Patent No. 6,608,406 to Bersiek (hereinafter referred to as "Bersiek").

Each of claims 15-18 is a dependent claim that depends either directly or indirectly from independent claim 1. Each of claims 19-20 is a dependent claim that depends either directly or indirectly from independent claim 13. Consequently, each of these dependent claims is at least allowable for the reasons noted with respect to the independent claim from which it depends. However, each of these dependent claims may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

Claims 1, 13, and 14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Potega in view of Nierlich, and further in view Karanam.

Claim 1

Independent claim 1 is directed to a reconfigurable network-equipment power-management system. Claim 1 comprises a combination of elements, including:

> a plurality of power-control outlets disposed in the power-distribution apparatus, the plurality of power-control outlets connectable in power supply

> communication with the power input and one or more separate electronic appliances;
>
> a plurality of power-control relays disposed in the power-distribution apparatus, each of the plurality of power-control relays in power control communication with at least one among the plurality of power-control outlets, whereby the plurality of power-control outlets and the plurality of power-control relays provide operating power to the one or more separate electronic appliances and are able to interrupt the operating power to the one or more separate electronic appliances;
>
> a power-control outlet user configuration file accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration file comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus

It is respectfully submitted that the cited references do not render claim 1 obvious. Potega is directed to a power supply that may detect power requirements and configure itself to provide correct power to a particular device. A number of power supplies may be used, with a master control unit that controls the delivery and supply of power that each of the power supplies provides to devices. For example, as described at col. 30, line 63, through col. 31, line 8, a remote Master Control Unit (MCU) sends commands to controllable power supplies. However, Potega is devoid of any disclosure of a power-control outlet configuration file accessible by a remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration file comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus, as claimed. In fact, Potega does not describe anything relating to a power-control outlet user configuration file.

Nierlich and Karanam are discussed above. As discussed above, Nierlich does not teach or suggest a power-control outlet user configuration file, nor a power-control outlet user configuration file accessible by a remote user system for

affecting power provided or interrupted to a plurality of power-control outlets, a memory, or at least one power controller board, as claimed. Nierlich describes a system and method for monitoring and controlling energy distribution in which control signals may be transmitted to end-users or end-user control systems in the event of a curtailment event.

Karanam, as discussed above, is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. As discussed above, Karanam does not teach or suggest anything related to a power-control outlet user configuration file, nor a power-control outlet user configuration file accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration file comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus. Furthermore, Karanam also has no disclosure related to a memory, or power controller board as claimed in claim 1.

The Office Action, at page 5, states that Potega does not provide a power-control outlet configuration file, and asserts that rather than sending commands one at a time as taught by Potega, one of ordinary skill in the art would have been motivated to use Nierlich's configuration file to save on the amount of communications on the network. Applicants submit that there is no indication in any of the references suggesting such a modification, and that, in fact, Potega would not work for its intended purpose if modified as suggested in the Office Action.

As noted, the Office Action asserts that to the extent Potega transfers information from a MCU to a controllable power supply, transferring the information in a configuration file would be more efficient. However, Potega is directed to applications in which various different powered devices may be connected to a power supply, and the power supply reconfigures its output voltage to the powered device's requirements without user intervention and without any pre-programmed prior knowledge or information about each device. See. Col. 11,

lines 54-64. Such a system is useful, as described at col. 11, lines 54-56, for aircraft, trains, buses, etc. where a user may desire to connect a portable device to a power supply. Potega describes that the power requirements for the device are determined, and then power supplied to the device accordingly. Thus, if Potega were modified as suggested in the Office Action, a configuration file would be provided for affecting power provided or interrupted to the plurality of power-control outlets would be included in this system. However, if Potega were operated using a configuration file as claimed, this reference would no longer work for its intended purpose of providing power based on a particular device that is connected to a power supply. Furthermore, the Office Action cites reduced network traffic as providing motivation to modify Potega in the manner as described. However, each time a new device is added, a new configuration file would be required, and thus the amount of network communication would actually increase. In fact, if anything, it is submitted that Potega would actually teach away from a combination as suggested in the Office Action, which is further evidence of non-obviousness.

Therefore, it is submitted that Potega, Nierlich, and Karanam, alone or in any reasonable combination, do not render claim 1 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. $ 103(a) rejection should be withdrawn from independent claim 1 and such action is respectfully requested.

Claim 13

Independent claim 13 is directed to a remote power manager system in communication with a distal power manager application through a data communications network. Claim 13 comprises a combination of elements, including:

> a remote power manager having power input connectable to a power network that provides power to be distributed to associated electronic devices, a plurality of

> power-control power output ports connectable to the power input and the associated electronic devices, a power controller in power controlling communication with the plurality of power-control power output ports, a data communications network port system in communication with the power controller and being connectable to the data communications network, and a power manager memory providing storage for a power-control power output port user configuration file, the power-control power output port user configuration file comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports

It is respectfully submitted that the cited references do not render claim 13 obvious. Potega, as discussed above, is directed to a power supply that may detect power requirements and configure itself to provide correct power to the device. A number of power supplies may be used, with a master control unit that controls the delivery and supply of power for each of the power supplies. For example, as described at col. 30, line 63, through col. 31, line 8, a remote Master Control Unit (MCU) sends commands to controllable power supplies. However, Potega is devoid of any disclosure of a remote power manager as claimed, having a plurality of power-control power output ports connectable to the power input and the associated electronic devices and a power manager memory providing storage for a power-control power output port user configuration file, the power-control power output port user configuration file comprising user configuration data for supplying or interrupting power to each of the plurality of power-control power output ports, as claimed. In fact, Potega does not describe anything relating to a power-control outlet user configuration file.

Nierlich and Karanam are discussed above. As discussed above, Nierlich does not teach or suggest a power-control outlet user configuration file, nor a power-control outlet user configuration file accessible by a remote user system for affecting power provided or interrupted to a plurality of power-control outlets, a memory, or at least one power controller board, as claimed. Nierlich describes a system and method for monitoring and controlling energy distribution in which

control signals may be transmitted to end-users or end-user control systems in the event of a curtailment event.

Karanam, as discussed above, is directed to a system that includes a dynamic data exchange (DDE) server used in a power management control system. As discussed above, Karanam does not teach or suggest anything related to a power-control outlet user configuration file, nor a power-control outlet user configuration file accessible by the remote user system for affecting power provided or interrupted to the plurality of power-control outlets, wherein the power-control outlet user configuration file comprises user configuration data for each of the plurality of power-control outlets disposed in the power-distribution apparatus. Furthermore, Karanam also has no disclosure related to a memory, or power controller board as claimed in claim 1.

The Office Action, at page 5, states that Potega does not provide a power-control outlet configuration file, and asserts that rather than sending commands one at a time as taught by Potega, one of ordinary skill in the art would have been motivated to use Nierlich's configuration file to save on the amount of communications on the network. Applicants submit that there is no indication in any of the references suggesting such a modification, and that, in fact, Potega would not work for its intended purpose if modified as suggested in the Office Action.

As noted, the Office Action asserts that to the extent Potega transfers information from a MCU to a controllable power supply, transferring the information in a configuration file would be more efficient. However, Potega is directed to applications in which various different powered devices may be connected to a power supply, and the power supply reconfigures its output voltage to the powered device's requirements without user intervention and without any pre-programmed prior knowledge or information about each device. See. Col. 11, lines 54-64. Such a system is useful, as described at col. 11, lines 54-56, for aircraft, trains, buses, etc. where a user may desire to connect a portable device to a power supply. Potega describes that the power requirements for the device are

determined, and then power supplied to the device accordingly. Thus, if Potega were modified as suggested in the Office Action, a configuration file would be provided for affecting power provided or interrupted to the plurality of power-control outlets would be included in this system. However, if Potega were operated using a configuration file as claimed, this reference would no longer work for its intended purpose of providing power based on a particular device that is connected to a power supply. Furthermore, the Office Action cites reduced network traffic as providing motivation to modify Potega in the manner as described. However, each time a new device is added, a new configuration file would be required, and thus the amount of network communication would actually increase. In fact, if anything, it is submitted that Potega would actually teach away from a combination as suggested in the Office Action, which is further evidence of non-obviousness.

Therefore, it is submitted that Potega, Nierlich, and Karanam, alone or in any reasonable combination, do not render claim 13 obvious. Accordingly, claim 1 is allowable because the cited references do not render the claim obvious. Accordingly, the applicants respectfully submit that the 35 U.S.C. $ 103(a) rejection should be withdrawn from independent claim 13 and such action is respectfully requested.

Claim 14 is a dependent claim that depends from independent claim 13. Consequently, claim 14 is at least allowable for the reasons noted with respect claim 13 from which it depends. However, this dependent claim may be allowable for additional reasons, and the applicant reserves the right to assert any such reason in the future.

No claim related fees are believed to be due with this response. In the event any such fees are due, please debit Deposit Account 08-2623.

In the event that a petition for extension of time under 37 CFR §1.136(a) is required to have this reply considered and such a petition does not otherwise accompany this reply, please consider this a petition for an extension of time for the required number of months and authorization to debit Deposit Account 08-2623 for the required fee.

The application now appearing to be in form for allowance, reconsideration and allowance thereof is respectfully requested. If a telephone conversation will further the prosecution and/or expedite allowance, the examiner is invited to contact the undersigned attorney.

Respectfully submitted,

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